

**UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF MASSACHUSETTS**

\_\_\_\_\_  
MICHELLE P. BURK, Derivatively on )  
behalf of Sonus Networks, Inc., )  
a Delaware Corporation, )

Plaintiff )

Case No. 04-10384 (DPW)

v. )

HASSAN AHMED; EDWARD T. )  
ANDERSON; PAUL J. FERRI; RUBIN )  
GRUBER; PAUL SEVERINO; JOHN )  
MICHAEL O'HARA; EDWARD N. )  
HARRIS; STEPHEN NILL; and )  
PAUL R. JONES, )

Defendants )

and )

SONUS NETWORKS, INC., )  
a Delaware Corporation, )

Nominal Defendant. )  
\_\_\_\_\_)

**PLAINTIFF'S ASSENTED TO MOTION FOR EXTENSION OF TIME  
TO RESPOND TO MOTION TO STAY, OR IN THE ALTERNATIVE, TO DISMISS**

Plaintiff Michelle P. Burk, ("Plaintiff"), by and through her undersigned counsel, hereby moves this court for an extension of time until Tuesday, April 27, 2004 to respond to the Defendants' Motion to Stay, Or In the Alternative, to Dismiss ("Motion to Stay").

The Motion to Stay was served by Federal Express on April 2, 2004, and therefore, pursuant to Local Rule 7.1(B)(2), Plaintiff's response to the Motion to Stay would have been due on April 16, 2004. There is good cause for the requested extension in that the Plaintiff's counsel

had previously received the assent of Defendants' counsel to a motion for an extension to file and serve their response through April 23, 2004, and that Plaintiff's counsel experienced computer problems that have caused a further brief delay both in responding to the Motion to Stay and in filing this Motion. As a result, Plaintiff is requesting an extension through Tuesday April 27, 2004 in which to respond to the Motion to Stay.

CERTIFICATION PURSUANT TO LOCAL RULE 7.1(A)(2)

Undersigned counsel hereby certify that they conferred with counsel for the Defendants in good faith in effort to resolve or narrow the issues raised by this Motion and that Defendants' counsel indicated that they assent to the relief sought by this Motion.

Respectfully submitted,

/s/ Peter A. Lagorio  
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